

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOANNA WILSON, as Independent Administrator
of the Estate of AREON J. MARION, Deceased,

Plaintiff,

v.

COOK COUNTY, ILLINOIS, a unit of local government
and d/b/a COOK COUNTY HEALTH AND
HOSPITALS SYSTEM and CERMAK HEALTH
SERVICES OF COOK COUNTY, YASER HAQ, M.D.,
STEVE PASCHOS, M.D., MICHAEL BEDNARZ, M.D.,
AHLEAH C. BALAWENDER PA-C,
JASON SPRAGUE, LAUREN CARTWRIGHT,
NIKKI RUFFIN, COOK COUNTY SHERIFF, AND
OFFICER B. VARGAS 16976,

Defendants.

Case No.: 22-cv-06886

Hon. Andrea R. Wood

JOINT MOTION FOR ENTRY OF THE PROPOSED CONFIDENTIALITY ORDER

NOW COME Plaintiff, Joanna Wilson, as Independent Administrator of the Estate of Areon J. Marion, Deceased, and Defendants (collectively herein “Parties”), by and through their respective attorneys, and respectfully move this Court pursuant to Federal Rules of Civil Procedure 26(c) and 45 C.F.R. §§ 160 and 164 to enter the proposed Confidentiality Order. In support thereof, the Parties state as follows:

1. The Parties anticipate documents containing confidential information related to the parties and non-parties will be sought and produced in this matter.

2. Confidential information is defined in Paragraph 2 of the proposed Confidentiality Order.

3. The Parties have drafted a proposed Confidentiality Order based on the Model Confidentiality Order developed by the Northern District of Illinois.

4. The undersigned counsel will submit the proposed Confidentiality Order in word format to Proposed_Order_Wood@ilnd.uscourts.gov pursuant to the Court's standing order.

5. The Parties believe entry of a protective order will likely serve to minimize discovery disputes, as the parties will more readily disclose documents knowing they will only be used for the purposes of the instant litigation.

WHEREFORE, the Parties request this Court enter of the Proposed Confidentiality Order.

Respectfully submitted,

/s/ James C. Pullos

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Attorney for Defendant Cook County Illinois, Cook County, Illinois, d/b/a Cook County Health and Hospitals System and Cermak Health Services of Cook County, Yaser Haq, M.D., Steve Paschos, M.D., Ahleah C. Balawender PA-C, Jason Sprague, Lauren Cartwright, Nikki Ruffin (hereafter "Cook County Defendants")

/s/ Antonio Lee

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Attorney for Defendants Sheriff of Cook County and Officer Vargas

CERTIFICATE OF SERVICE

I, James C. Pullos, an attorney, hereby certify that on March 23, 2023 I served **JOINT MOTION FOR ENTRY OF THE PROPOSED CONFIDENTIALITY ORDER** by causing a true and accurate copy of such papers to be filed and served on all counsel of record via the Court's CM/ECF electronic filing system.

/s/ James C. Pullos

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